



Central Sierra Environmental Resource Center
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James Marshall and Anand Mamidi
CA Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive #200
Rancho Cordova, CA 95670-6114

COVER LETTER FOR COMMENTS ON T.U.D. NPDES PERMIT

To James Marshall and Anand Mamidi:

It is likely that in developing the current proposed tentative waste discharge requirements for TUD, you or others on your staff have come to know and like Pete Kampa (general manager) and Tom Scesa (district engineer) of the Tuolumne Utilities District. You will likely have found that the District has been generally responsible in complying with their current permitted discharge requirements. And you will likely have found that submitted information and proposed plans appear to be reasonable and appear to justify approval of the new NPDES permit.

Our non-profit center's staff has worked with TUD for more than a decade and we, too, like and respect the District's manager and engineer. In this instance, however, we believe that (especially in the past) the District has misled State and Regional officials through the filing of an Urban Water Management Plan and a Feasibility Study Report that both erroneously claim that TUD is encouraging and pursuing water conservation.

When I testified years back at a previous NPDES permit hearing for TUD, the officials representing TUD (since retired) simply did not accurately admit that the District has done almost nothing to reduce the volume of wastewater generated by TUD customers through the use of water conservation measures. On the contrary, the TUD board and staff have repeatedly focused solely on purchasing spray-field property or adding effluent spray customers, without ever doing even basic water conservation programs that would lead to reduced levels of wastewater at Quartz reservoir.

In the accompanying comments, please note that our staff is only asking for a denial or rejection of the NPDES permit if there is no clear condition requiring TUD to develop a water conservation wastewater reduction plan that will go hand in hand with active spraying of treated effluent. CSERC strongly opposes further discharges of up to 2.9

million gallons per day into Woods Creek (on average). However, if there is no feasible alternative, such discharges can be considered unavoidable. YET IF TUD IS NOT REQUIRED TO ACTIVELY, EFFECTIVELY PURSUE A PROGRAM TO REDUCE WASTEWATER THROUGH WATER CONSERVATION MEASURES AND EDUCATIONAL EFFORTS, THEN IT IS NOT TRUE THAT DISCHARGING EFFLUENT INTO WOOD CREEK IS THE ONLY ALTERNATIVE.

As you review our full comments, please note carefully the high number of misleading or totally incorrect claims concerning water conservation that are contained within the Urban Water Management Plan and the Feasibility Study report from TUD. It would be hoped that the State and RWQCB desire accurate plans, accurate reports, and sincere efforts to implement win-win programs such as water conservation and wastewater reduction.

Please also note that despite our Center's strong opposition to further discharges into Woods Creek, all that we are asking for is a clear condition requiring TUD to produce a water conservation plan and a timeline for implementing water conservation and wastewater reduction measures that the district and the Board find feasible.

Respectfully submitted,

John Buckley, executive director